

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE WONDER AUTO TECHNOLOGIES,
INC. SECURITIES LITIGATION

No.11-CV-03687-PAE

ECF CASE

This Document Relates To:

**LEAD PLAINTIFF'S NOTICE OF MOTION FOR (I) PRELIMINARY
APPROVAL OF SETTLEMENT, (II) CERTIFICATION OF THE
CLASS FOR PURPOSES OF SETTLEMENT AND
(III) APPROVAL OF NOTICE TO THE SETTLEMENT CLASS**

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement dated January 9, 2013, attached hereto as Exhibit 1; the accompanying Memorandum of Law; and all other papers and proceedings herein, Lead Plaintiff aAd Partners, LP will move this Court, under Rule 23 of the Federal Rules of Civil Procedure, at a date, time and location to be set by the Court, for an order: (i) preliminarily approving the proposed Settlement; (ii) certifying the proposed Settlement Class and Lead Plaintiff as Settlement Class representative and appointing Lead Counsel as Settlement Class Counsel for purposes of the Settlement; (iii) approving the form and manner of giving notice of the proposed Settlement to members of the Settlement Class; and (iv) scheduling a hearing on final approval of the Settlement and Lead Counsel's motion for an award of attorneys' fees and reimbursement of Litigation Expenses.

Attached hereto as Exhibit 2 is a copy of the proposed Order Preliminarily Approving Proposed Settlement and Providing for Notice (and its exhibits).

Dated: January 11, 2013

Respectfully submitted,

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By: /s/Thomas C. Bright

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Liaison Counsel

CERTIFICATE OF SERVICE

I, Thomas C. Bright, counsel for Lead Plaintiff, hereby certify that on January 11, 2013, I filed the foregoing with the Clerk of the Court using the Court's CM/ECF system which will send electronic notification of such filing to all counsel of record in the within action.

/s/Thomas C. Bright

Thomas C. Bright